

United States District Court
For The District of Columbia

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

SUSHIL BANSAL

CASE NUMBER:

XXXXXXXXXXXXXXXXXXXX
Dunn Loring, VA 22027

DOB: xxxxxxxx, 1967

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

COUNT ONE
(Conspiracy to Commit Bribery)

Between in or about October 2008 and present in a continuing course of conduct, in the District of Columbia and elsewhere, SUSHIL BANSAL and YUSUF ACAR did knowingly combine, conspire, confederate and agree with each other and others known and unknown, to commit the offense of bribery of a public official by inducing Yusuf Acar to do an act or omit to do an act in violation of his official duty in return for a thing of value. (Conspiracy to Commit Bribery of a Public Official in violation of Title 18, United States Code, Sections 201 and 371).

COUNT TWO
(Conspiracy to Launder Monetary Instruments)

Between in or about October 2008 and the present, in a continuing course of conduct, in the District of Columbia and elsewhere, YUSUF ACAR, SUSHIL BANSAL and others conspired to commit the offense of laundering monetary instruments, in violation of 18 U.S.C. § 1956. (Conspiracy to Commit the Offense of Laundering Monetary Instruments, in violation of Title 18 U.S.C., Sections 1956(a)(1)-(2), 1956(h)).

I further state that I am Andrew Sekela, Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

See Attached Affidavit

Continued on the attached sheet and made a part hereof:

☒ Yes

☐ No

Signature of Complainant

Andrew Sekela, Special Agent

Federal Bureau of Investigation

AUSA, Thomas J. Hibarger, (202) 514-7385

AUSA, Glenn Leon, (202) 305-0174

Sworn to before me and subscribed in my presence,

Date

at

Washington, D.C.

City and State

Name & Title of Judicial Officer

Signature of Judicial Officer